

Message

From: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
Sent: 2/19/2021 1:41:15 AM
To: Praskins, Wayne [Praskins.Wayne@epa.gov]
Subject: RE: HPNS: draft outline for building RG dispute

This looks great, Wayne. Thank you for updating!

Maybe a simple way to help folks understand the describe indirect vs direct pathway on the outline could be...

The Navy has not justified its decision to simulate exposure to the removable fraction of any residual contamination in site buildings in RRB using the “indirect” pathway ~~in RRB~~ rather than the “direct” exposure pathway. The direct pathway estimates exposure at the source (directly on the building) while the indirect pathway estimates exposure after contaminants move from the source area to the indoor environment. (RRB provides ~~two~~ both options for estimating risks via the ingestion exposure pathway.) This decision appears to reduce the estimated health risks associated with the building RGs by an order of magnitude.

Yolanda

From: Praskins, Wayne <Praskins.Wayne@epa.gov>
Sent: Thursday, February 18, 2021 2:47 PM
To: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>
Subject: RE: HPNS: draft outline for building RG dispute

Yolanda – Thanks for your comments!

Please see revised draft responding to Yolanda’s comments.

From: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Sent: Wednesday, February 17, 2021 4:44 PM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>
Subject: RE: HPNS: draft outline for building RG dispute

This is great, Wayne. Thank you for pulling this together, as it certainly provides more clarity. I also like the approach of laying out the four concerns not directly related to the BPRG calculator, as appropriate.

I do have some questions/comments and edits (as always). I also added a paragraph remind the Navy of its responsibility to continue with scheduled work unrelated to the dispute. This is important after the suggestion from the Navy’s December letter they might stop all ongoing remediation efforts.

Yolanda Sanchez
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From: Praskins, Wayne <Praskins.Wayne@epa.gov>
Sent: Wednesday, February 17, 2021 9:49 AM
To: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Fairbanks, Brianna <Fairbanks.Brianna@epa.gov>
Subject: HPNS: draft outline for building RG dispute

Please see attached.

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